

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Donald Winn, individually and on behalf of	)	C/A No. 2:11-01571-MBS
others similarly situated,	)	
	)	
Plaintiff,	)	<b>PLAINTIFF'S MOTION TO COMPEL</b>
	)	
v.	)	
	)	
Jacobs Engineering Group, Inc., and Jacobs	)	
Field Services North America, Inc.,	)	
	)	
Defendants.	)	

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Civil Rule 37.01, Plaintiff Donald S. Winn moves to compel Defendants Jacobs Engineering Group, Inc., and Jacobs Field Services North America, Inc. to respond to Plaintiff's First Sets of Interrogatories and Requests for Production. Based on this motion and the accompanying memorandum, exhibits, and related materials filed in support, Plaintiff respectfully requests that the Court enter an Order compelling Defendants to provide adequate and complete responses to Plaintiff's interrogatories 1, 3, 5, 6, and 7 and document requests 1, 2, 3, 5, 7, 9, 8, 11, 12, 13, 14, and 15, and to grant such further relief as is just and necessary.

**CERTIFICATION**

The undersigned certifies that prior to the filing of this Motion, Plaintiff's counsel conferred in good faith with Defendant's counsel in an effort to secure the information and materials requested without the need for Court action.

Dated: October 10, 2011

s/ E. Brandon Gaskins  
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ATTORNEYS FOR PLAINTIFF  
AND THOSE SIMILARLY SITUATED

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the following documents:

- Plaintiff's Motion to Compel;
- Plaintiff's Memorandum in Support of Motion to Compel, with Exhibits 1-9; and
- Declaration of Charles G. Frohman

with the Clerk of Court in the United States District Court for the District of South Carolina using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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